#### **Thomas Gorman**

From:

Elizabeth Haring < lizharing@yahoo.com>

Sent:

Thursday, September 27, 2018 11:59 AM

To:

tgorman@chapter13alexva.com; Guzinski Joseph (USTP);

mmichel@chapter13alexva.com

Subject:

Fw: Ilaine Upton Notice of Deposition

**Attachments:** 

Scanned from a Xerox Multifunction Printer.pdf

Dear Sirs,

Ilaine Upton has also been invited to the depositions at Rudiger & Green on Monday, October 1, 2018. There is newly discovered evidence showing a pattern of Chapter 13 trustee misconduct and retaliation against Debtors. I deserve to get a fair hearing.

I look forward to seeing you then.

fyi, more deposition notices are also forthcoming.

Very truly yours, Elizabeth Haring Coomes

#### In the

# **United States Bankruptcy Court**

# For the Eastern District of Virginia

### Alexandria Division

In re: Elizabeth H. Coomes.

Debtor

mes,

Case No: 17-13497-BFK

Chapter 13

# NOTICE OF DEPOSITION

## PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure and Rule 7030-1 of the Local Rules of Bankruptcy Practice and Procedure, the Debtor will take the deposition of Ilaine Upton, Esq.

The deposition will commence October 1, 2018, beginning at 1:00 p.m. (EST) at the offices of Rudiger & Green located at:

Rudiger & Green 4116 Leonard Drive Fairfax, VA 22030

or on such other date and at such other location as mutually agreed by Ilaine Upton, Esq. and the Debtor. The deposition will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by audio, video and/or stenographic means.

Pursuant to Rule 34, the Debtor requires the deponent to produce the following documents at the deposition:

Copies of all of records regarding deponent's complaint regarding the standing Chapter 13 Trustee Thomas Gorman.

ELIZABETH H. COOMES

Debtor

Dated: September 27, 2018

Villanova, PA